Matthew Monforton Monforton Law Offices, PLLC 32 Kelly Court Bozeman, Montana 59718 Phone: (406) 570-2949 Fax: (406) 551-6919 matthewmonforton@yahoo.com

Nicholas R. Barry*
Ian Prior*
AMERICA FIRST LEGAL FOUNDATION
611 Pennsylvania Avenue S.E. No. 231
Washington, D.C. 20003
Phone: (202) 964-3721
nicholas.barry@aflegal.org
ian.prior@aflegal.org
*(pending approval of pro hac vice admittance)

Attorneys for Plaintiff Johnathan Talbot

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA

Johnathan Talbot)
Plaintiff,) Cause No
) AFFIDAVIT UNDER) PENALTY OF PERJURY
Manoah Ainuu, and The North Face Apparel Corp., a Delaware)))
Company. $Defendants$)

COMMONWEALTH OF VIRGINIA)
)
LOUDOUN COUNTY)

- I, Ian Prior, pursuant to Rule 83.1(d)(3) of the United States

 District Court of Montana, being first duly sworn on oath, state as

 follows:
- A. I reside in the Commonwealth of Virginia and am an attorney with America First Legal Foundation, located at 611 Pennsylvania Avenue, SE, Suite 231, Washington, D.C. 20003, telephone 571-639-6711, and email: ian.prior@aflegal.org.
- B. With Plaintiff's Motion for Admission Pro Hac Vice, the appropriate admission fee was paid.
- C. I am proficient in electronic filing in the United States District Court for the District of Massachusetts.
- D. I am admitted to practice in the bars of the United States Court of Appeals for the First Circuit (6/30/10), the United States District Court for the District of Massachusetts (4/27/06), and the United States District Court for the District of Maryland (5/26/23). I am also admitted to practice in the bars of the Commonwealth of Massachusetts (1/15/03), the District of Columbia (10/1/23), and the

State of Rhode Island and Providence Plantations (11/27/02). None of my admissions have been terminated.

- E. I am in good standing and eligible to practice in these courts.
- F. I am not currently suspended or disbarred in any other court.
- G. I have never been held in contempt, otherwise disciplined by any court for disobedience of its rules or orders or sanctioned under Fed. R. Civ.
 P. 11 or 37(b), (c), (d), (f), or their state equivalent.
- H. I have not concurrently or within the two years preceding the date of this application made any *pro hac vice* application to this court.
- I. I fully understand that my *pro hac vice* admission in this court is personal to me only and is not admission of a law firm and that I will be held fully accountable for the conduct of the litigation in this court.
- J. I have complied with Mont. R. Prof'l Conduct 8.5. Attached as Exhibit1 is my agreement to be bound by the Mont. R. Prof'l Conduct 8.5.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of November, 2023.

Ian Prior

Matthew Monforton MONFORTON LAW OFFICES, PLLC 32 Kelly Court Bozeman, Montana 59718 Phone: (406) 570-2949

Fax: (406) 551-6919

matthewmonforton@yahoo.com

Nicholas R. Barry*
Ian Prior*
AMERICA FIRST LEGAL FOUNDATION
611 Pennsylvania Avenue S.E. No. 231
Washington, D.C. 20003
Phone: (202) 964-3721
nicholas.barry@aflegal.org
ian.prior@aflegal.org
*(pending approval of pro hac vice admittance)

Attorneys for Plaintiff Johnathan Talbot

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA

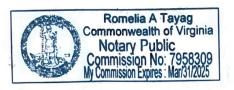
Johnathan Talbot	
Plaintiff,	Cause Notes of Total
) AFFIDAVIT UNDER
	PENALTY OF PERJURY
	EXHIBIT A
Manoah Ainuu, and The North)
Face Apparel Corp., a Delaware	
Company.	
Defendants	
EXH	IBIT A

I, Ian Prior, hereby certify in writing and under oath to this Court that, except as to Rules 6.1-6.4 of the Rule of Professional Conduct ("Rules"), I will be bound by these Rules in my practice of law in Montana and will be subject to the discipline authority of Montana.

A copy of this certification will be mailed, contemporaneously, to the business office of the State Bar of Montana in Helena, Montana.

Ian Prior

Subscribed and sworn before me this ______ day of November, 2023, by whose identity is known to me.



Notary Public

My commission expires: MARCH 31, 2025

County/City of LOUDOUN
Commonwestin/State of VIRGUIA
The foregoing instrument was acknowledged before me this day of UDVAUBLE

(name of from seeking conowledgement)

Notary Pulle (V)
My Commission Expires: MARCH 31, 225